

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE: FLINT WATER CASES

Case No. 5:16-cv-10444-JEL-MKM  
Hon. Judith E. Levy, District Judge

This Document Relates To:  
BELLWETHER III

Case No. 5:17-cv-10164-JEL-KGA

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**DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH  
AMERICA, INC., AND VEOLIA WATER NORTH AMERICA  
OPERATING SERVICES, LLC’S MOTION FOR LEAVE TO FILE  
SUPPLEMENTAL DECLARATION IN SUPPORT OF MOTION TO  
EXCLUDE OPINIONS AND TESTIMONY OF DR. AARON SPECHT**

Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC (VNA) move for leave to file a short supplemental declaration from Dr. William Huber in support of their Motion to Exclude Opinions and Testimony of Dr. Aaron Specht (ECF No. 2916). *See* Aug. 14, 2024 Suppl. Decl. of William A. Huber, Ph.D. (Suppl. Dec.).

At the August 7 *Daubert* hearing, Plaintiffs argued that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. VNA seeks leave to submit Dr. Huber’s supplemental declaration to respond to Plaintiffs’ new argument.

As Dr. Huber’s declaration explains, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Court should grant leave to file Dr. Huber's supplemental declaration and exclude Dr. Specht's opinions.

As Local Rule 7.1 requires, on August 13, 2024, VNA sent counsel for Plaintiffs an email identifying the points raised in this motion. Plaintiffs responded that they object to and intend to oppose the motion.

Respectfully submitted,

**CAMPBELL, CONROY  
& O'NEIL P.C.**

**MAYER BROWN LLP**

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Veolia Water North America Operating Services, LLC*

Dated: August 14, 2024

### **CERTIFICATE OF SERVICE**

I hereby certify that August 14, 2024, I electronically filed the foregoing document with the Clerk of the Court using the ECF System, which will send notification to the ECF counsel of record.

Respectfully submitted,

/s/ James M. Campbell

Dated: August 14, 2024